

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

ARLENE J. DELGADO,

Plaintiff,

-vs-

No. 19-cv-11764 (AT) (KHP)
REQUEST FOR ADMISSION
F.R.C.P. 36

DONALD J. TRUMP FOR PRESIDENT, INC.,
TRUMP FOR AMERICA, INC., SEAN SPICER,
individually, REINCE PRIEBUS, individually,
and STEPHEN BANNON, individually,
Defendants.

REQUESTS FOR ADMISSION

PROPOUNDING PARTY: PLAINTIFF

RESPONDING PARTY: DEFENDANTS (NOTE: Donald J. Trump for President, Inc.,
thereafter named Make America Great Again PAC, is referred to as "Defendant-Campaign.")

Plaintiff Arlene Delgado requests, pursuant to Federal Rule of Civil Procedure 36 and pursuant, in part, to Hon. Katharine Parker's April 24, 2024 Order, that Defendants admit to the following within 30 days after service of these Requests for Admission:

REQUEST FOR ADMISSION 1 (TO DEFENDANT-CAMPAIGN):

Admit that Campaign team members in 2015-2016 were not informed of the existence of an HR director available to them.

REQUEST FOR ADMISSION 2 (TO DEFENDANT-CAMPAIGN):

Admit the name of the Human Resources director/s from 2015-2020 (this includes any individual handling Human Resources duties, regardless of title).

REQUEST FOR ADMISSION 3 (TO ALL DEFENDANTS):

Admit the date on which the decision was made not to hire Plaintiff was December 27, 2024 and, if not, the correct date.

REQUEST FOR ADMISSION 4 (TO DEFENDANT-CAMPAIGN):

Admit who is the individual/s who makes/make any decisions regarding this case, on behalf of Defendant-Campaign.

REQUEST FOR ADMISSION 5 (TO DEFENDANT-CAMPAIGN):

Admit who signed, on behalf of Donald. J. Trump for President, Inc., the stipulation filed with the Court on Friday, May 3, 2024.

REQUEST FOR ADMISSION 6 (TO ALL DEFENDANTS):

Admit that you cannot produce a document, email, or communication reflecting who made the decision to not provide Plaintiff with a White House job.

REQUEST FOR ADMISSION 7 (TO ALL DEFENDANTS):

Admit that you cannot produce a document, email, or communication reflecting the reasons behind the decision to not provide Plaintiff with a White House job.

REQUEST FOR ADMISSION 8 (TO ALL DEFENDANTS):

Admit that the Plaintiff may have suffered significant stress during her pregnancy as a result of your actions.

REQUEST FOR ADMISSION 9 (TO ALL DEFENDANTS):

Admit that part of the \$4.1 million in payments, in the two month period between November 12, 2020 and January 13, 2021, from Defendant-Campaign to Kasowitz Benson Torres LLP, were related, or consisted of, settlement payments for staffers, contractors, or vendors of Defendant-Campaign during the 2020 campaign cycle, regarding gender-related (gender discrimination, sexual harassment, and/or pregnancy discrimination) complaints.

REQUEST FOR ADMISSION 10 (TO DEFENDANT-CAMPAIGN):

Admit that you faced concerns raised by, and possible formal complaints from, Hannah Castillo, regarding gender-related discrimination.

Respectfully submitted,

s/Arlene Delgado

Arlene Delgado

Plaintiff, *pro-se*